

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
-----	X	

**STIPULATION FOR ENTRY OF ORDER REGARDING  
CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.**

Wade Trim Associates Inc. (“Wade Trim”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* attached hereto as **Exhibit 1**.

1. On February 19, 2014, Wade Trim filed its proof of claim [Claim No. 1437] (the “Claim”) in the amount of \$69,704.29.

2. In resolution of Wade Trim’s Claim, the parties have agreed that: (a) the City will pay \$20,900.72 to Wade Trim, (b) the remainder of the Claim will be allowed as a general unsecured claim in the reduced amount of \$31,931.53 and (c) Wade Trim has no other claims against the City, whether for the pre-petition or post-petition periods.

3. Nothing in this stipulation is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against Wade Trim, including, without limitation, claims under chapter 5 of the Bankruptcy Code.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties’ stipulation.

Respectfully submitted by:

<b>WADE TRIM ASSOCIATES INC.</b>  By: <u>/s/ Ralph Picano (with consent)</u> Ralph Picano Wade Trim Associates Inc. 500 Griswold St. Ste. 2500 Detroit, MI 48226 Phone: (313) 961-3650 rpicano@wadetrim.com  <i>Representative for Wade Trim Associates Inc.</i>	<b>FOLEY &amp; LARDNER, LLP</b>  By: <u>/s/ John A. Simon</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com  <i>Counsel to the City of Detroit, Michigan</i>
--	---

Dated: November 24, 2015